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Attorney for Plaintiff
KEYHERRA GREEN

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KEYHERRA GREEN,

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE
DEPARTMENT, a political subdivision of the State
of Nevada and the County of Clark and operating
CLARK COUNTY DETENTION CENTER
(CCDC); NAPHCARE, INC., a foreign corporation,
doing business in State of Nevada and is the Medical
Care Provider for the Clark County Detention
Center; FRED MERRICK; LORA CODY;
MENENLYN ELIZAN; RAY MONTENEGRO;
GWENDOLYN MYERS; and DOES 4-10, inclusive,

Defendants.

Case No. 2:20-cv-00769-KJD-DJA

**STIPULATION AND PROPOSED
ORDER TO EXTEND DATE FOR
PLAINTIFFS TO FILE RESPONSE TO
DEFENDANTS MOTION FOR
RECONSIDERATION**

(First Request)

IT IS HEREBY STIPULATED AND AGREED between the parties by and through their
respective counsel, that this Court extend the responses deadline from the current date of April 15 to
April 22 for Plaintiff to file her response to defendants Motion for Reconsideration (ECF 141) of this
Court's Order regarding claim three, denying Defendants motion for summary judgment as to Plaintiffs
claim for malicious prosecution(ECF 141). This extension will not delay the case. The extension will

1 allow plaintiffs time to complete her response and is not made for any improper purpose. Plaintiff's
2 counsel has numerous other deadlines and commitments including depositions this week with
3 counsel who represent the defendants in this case in another case as well as extensive motion
4 deadlines.

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8 15th day of April 2024.

9 PETER GOLDSTEIN LAW CORP

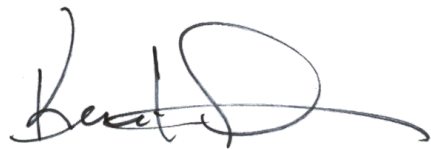
KAEMPFER CROWELL

10 By: /s/ Peter Goldstein
11 Peter Goldstein
12 Nevada Bar No. 6992
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13 Las Vegas, Nevada 89145
-and-
MALCOM P. LAVERGNE & ASSOC.
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16 *Attorneys for Plaintiff*

By: /s Lyssa S. Anderson
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1980 Festival Plaza Drive, Suite 650
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Attorneys for Defendants
Las Vegas Metropolitan Police
Department, Fred Merrick and
Lora Cody

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18 **IT IS SO ORDERED**

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20 DATED this 15th day of April 2024

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24 UNITED STATES DISTRICT COURT JUDGE

CERTIFICATE OF SERVICE

I am employed in the County of Clark, State of Nevada. I am over the age of eighteen years and not a party to the within action; my business address is 10161 Park Run Drive, Suite 150, Las Vegas, Nevada 89145.

I hereby certify that on this 15 day of April 15, 2024, a true and correct copy of the following document **STIPULATION AND PROPOSED ORDER TO EXTEND TIME FOR PLAINTIFFS TO FILE A RESPONSE TO DEFENDANTS MOTION FOR RECONSIDERATION (First Request)** was served by electronically filing with the Court's CM/ECF electronic filing system to the following parties:

Lyssa S. Anderson, Esq.
Ryan W. Daniels, Esq.
Kristopher Kalkowski, Esq.
Erika Parker, Esq.
Joseph Dagher, Esq.
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*Attorneys for Defendants
Las Vegas Metropolitan Police Department,
Fred Merrick and Lora Cody*

I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

By: _____
An Employee of Peter Goldstein Law Corp